

1 SCOTT N. SCHOOLS (SCBN 9990)
United States Attorney

2 MARK KROTOSKI (CSBN 138549)
Chief, Criminal Division

4 ROBERT D. REES (CSBN 229441)
Assistant United States Attorney

5 JESSICA ERLANDSON
Law Clerk

7 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
8 Telephone: (415) 436-6488
FAX: (415) 436-7234
9 derek.owens@usdoj.gov

10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

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16 UNITED STATES OF AMERICA, } No. CR-06-0738 JL
17 Plaintiff, } STIPULATION AND [PROPOSED]
18 v. } ORDER TO EXCLUDE TIME AND
19 JEFFREY SAI-CHUNG NG, } DEFER PROSECUTION
20 Defendant. }

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22 The parties hereby request that the Court exclude time under the Speedy Trial Act in the
23 above captioned case pursuant to 18 U.S.C. § 3161(h)(2) from March 15, 2007, to September 15,
24 2007, for deferral of prosecution. The parties agree that pretrial diversion is an appropriate
25 disposition in this matter.

26 The United States has referred Mr. Ng to Pretrial Services for an intake evaluation. If
27 Mr. Ng meets the qualifications set forth by Pretrial Services, she will be placed on pretrial
28 diversion for no more than six months. Accordingly, the parties agree that the prosecution will

1 be deferred for a sixth month period of time for Ms. Huynh to demonstrate good conduct under
2 the conditions of a pretrial diversion program.

3 SO STIPULATED.

4 SCOTT N. SCHOOLS
5 United States Attorney

6 DATED: 03/15/07

/s/ Robert D. Rees
7 ROBERT D. REES
Assistant United States Attorney

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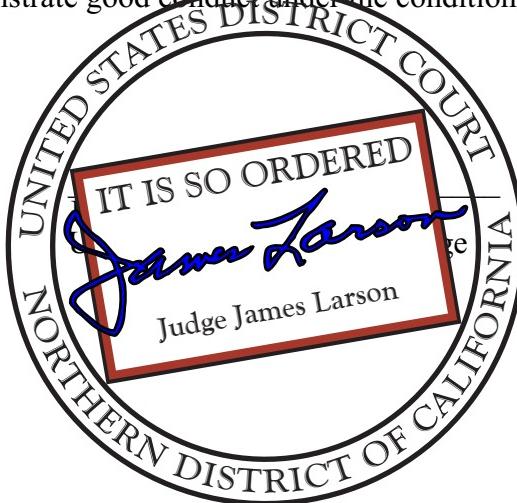
9 DATED: 03/15/07

/s/ Barry Portman
10 BARRY PORTMAN
Attorney for Mr. Ng

11 Based on the stipulation of the parties and for good cause shown, IT IS HEREBY
12 ORDERED that time is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(2)
13 from March 15, 2007, to September 15, 2007, for deferral of prosecution by the United States for
14 the purpose of allowing the defendant to demonstrate good conduct under the conditions of a
15 pretrial diversion program.

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17 DATED: March 27, 2007



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